

Message Text

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ACTION TRSE-00

INFO OCT-01 EUR-12 ISO-00 EB-07 L-03 FRB-03 COME-00 SEC-01

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FM AMEMBASSY LONDON

TO SECSTATE WASHDC 4629

C O N F I D E N T I A L LONDON 14034

DEPARTMENT PASS TREASURY

E.O. 11652: GDS

TAGS: EFIN. UK

SUBJECT: US-UK INCOME TAX TREATY NEGOTIATIONS

REF: STATE 182441

1. IN ACCORD WITH JUNE COMMITMENT OF CHANCELLOR OF EX-CHEQUER, AND SUBSEQUENT DISCUSSIONS BETWEEN TOP U.S. TREASURY AND INLAND REVENUE OFFICIALS. US AND UK DELEGATIONS HAVE REACHED AGREEMENT IN LONDON MEETINGS SEPTEMBER 3 TO SEPTEMBER 9 ON THE PRINCIPAL REVISIONS TO BE MADE IN THE US-UK INCOME TAX CONVENTIONS. AMONG OTHER CHANGES, THE NEW CONVENTION WILL REFLECT THE OECD MODEL INCOME TAX TREATY, AND WILL REDUCE THE TAXES ON DIVIDENDS FLOWING FROM A CORPORATION IN ONE COUNTRY TO A CORPORATION IN THE OTHER.

2. TOWARD THE END OF OCTOBER THE DELEGATIONS WILL MEET IN WASHINGTON AND IT IS ANTICIPATED THAT FINAL AGREEMENT WILL THEN BE REACHED.

RICHARDSON

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Message Attributes

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